

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04 CV 11948 RGS

SEYED MOHSEN HOSSEINI-  
SEDEHY,  
Plaintiff

v.

ERIN WITHINGTON  
Defendant

**DEFENDANT ERIN WITHINGTON'S  
PROPOSED VOIR DIRE OF THE JURY**

The Defendant Erin Withington ("Defendant") hereby requests that this Honorable Court conduct the following *voir dire* of the jury pool. If any juror answers these questions in the affirmative, the Defendant requests that those jurors be individually questioned regarding their impartiality as jurors:

1. Have you, or has any member of your immediate family and/or close friends been employed by the Boston Police Department or by any law enforcement agency?
2. Have you or any member of your immediate family ever been involved in a lawsuit against a police officer, a law enforcement agency, and/or one of its employees?
3. Would you be less likely to credit the testimony of a witness if that witness was a law enforcement officer?
4. Do you have an opinion of police officers based on media accounts of allegations of police misconduct?
5. Have you or any member of your immediate family and/or close friend ever had any negative experience in dealing with any police officer or other law enforcement official?
6. Have you or any member of your immediate family and/or close friend ever been the subject of a law enforcement official's investigation?

7. Do you or any member of your immediate family and/or close friend been arrested or charged with a criminal offense?
8. Have you or any member of your immediate family and/or close friend been the victim of a crime?
9. Have you or any member of your immediate family and/or close friend been the victim of a sexual assault?
10. Have you or any member of your immediate family and/or close friend belong to any civic, political or other organization that is concerned with civil rights or liberties reform?
11. Have you, or has any member of your immediate family, ever filed a complaint of police misconduct against any law enforcement officer?

Respectfully submitted,  
DEFENDANT ERIN WITHINGTON  
By her attorney:

/s/ Helen G. Litsas  
MaryBeth C. Long, BBO #652840  
Helen G. Litsas, BBO# 644848  
Assistant Corporation Counsel  
City of Boston Law Department  
Room 615, City Hall  
Boston, MA 02201  
(617) 635-4038 (Long)  
(617) 635-4023 (Litsas)

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electric Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 6, 2007.

/s/ Helen G. Litsas  
Helen G. Litsas